



YUMA AUDUBON SOCIETY
P.O. BOX 6395
YUMA, ARIZONA 85366-6395

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5-Mile Zone
D-8580
U. S. Bureau of Reclamation
P.O. Box 25007
Denver, CO 80225

The Yuma Audubon Society submits the following comments on the *5-Mile Zone Study Area Draft Resource Management Plan/Environmental Assessment* (referred to below as the "Plan").

The Plan Tries to Be Too Many Things to Too Many People

Overall, there are many good proposals in this plan, but we are concerned about the number and variety of activities that would be allowed in the western part of the 5-Mile Zone (outside the Yuma Desert Management Area for the Flat-tailed Horned Lizard), as well as certain activities that would be authorized for the Yuma Desert Management Area. This is true not only for the proposed Alternative D, but also to a lesser degree for Alternative B. Reclamation should reject Alternatives A and C outright because they fail to meet Reclamation's professed commitment to protection for the environment. For example, in the Executive Summary of the Plan (p. Ex-4), Reclamation states "The primary challenge is to protect natural and cultural resources while allowing uses that have a minimum effect on these resources." Why should "minimum" effect be the standard? In the case of the Flat-tailed Horned Lizard, the standard should almost always be no effect. It is true that there may be demand for consumptive uses of the land, but we argue that the 5-Mile Zone Study Area is essentially unable to support any more of these uses because of the damage that has already been done to Flat-tailed Horned Lizard habitat, in part because of leapfrog authorizations of uses in its habitat like a prison, port of entry, proposed landfill, sludge disposal site, roads (especially County 23rd and Avenue B) and, if built, the Area Service Highway.

The Plan at p. Ex-8 states that Alternative C "... would allow public demand and need for access to be fully met." Quite frankly, we doubt that the demand for public access could ever be *fully* met even if Reclamation allowed development of all of the

5-Mile Zone Area. No matter how much development has been authorized, there is always a demand for more. This is why we say that Reclamation should reject Alternative C—not only does the alternative fail to protect natural resources, it doesn't even meet its objective which is to "fully" meet demand.

The Plan also states at p. IV-13 that "The comprehensive land use strategy for the 5-mile zone would be the same as under Alternative B, *except* [original emphasis] that under Alternative C, the strategy would maximize recreation, community, or commercial development within the study area." This is a big "except." We believe that Reclamation's language in characterizing Alternative C here significantly understates the differences between Alternatives B and C. Elsewhere, Reclamation recognizes the damage that Alternative C would cause, stating "These developments would result in significant disturbance and degradation of large areas of remaining intact Sonoran desert." (Plan, p. V-40). And this isn't just any Sonoran Desert, it is some of the last remaining habitat for the Flat-tailed Horned Lizard in Arizona. Some of the proposals under Alternative C are absolutely inappropriate for federal lands withdrawn for a specific purpose (groundwater pumping) and where a species occurs that is covered by a rangewide management strategy that is supposed to protect it. Such inappropriate proposals include long-term visitor areas (essentially RV parks which people could occupy for six months), a golf course, tennis courts, baseball fields, soccer fields, and off-highway vehicle use.

The Plan itself states in relation to threats to vegetation and wildlife of the Yuma Desert on p. V-36, citing the U. S. Department of Defense, that "Conversion of natural habitat to urban, suburban, industrial, and agricultural use has resulted in and likely will continue to result in extensive habitat loss." The Plan further states that "Increased recreational use of the desert is resulting in habitat damage and declines in some species." Reclamation then notes, also on p. V-36 of the Plan, that "Recent observations in the 5-mile zone study area indicate that many sections are relatively undisturbed creosote bush-bursage, primarily along the eastern portion of the study area." It would be irresponsible for Reclamation to authorize further degradation of the habitat given the reason for which the lands were withdrawn (protection of groundwater) and Reclamation's mandate to protect the environment, especially the Flat-tailed Horned Lizard.

On p. VI-7, the Plan states that it will "Ensure a balance among wildlife resources, recreational opportunities, and authorized activities issued through land use agreements." Unfortunately, the balance is tipped against the Flat-tailed Horned Lizard and this is why further development of the 5-Mile Zone Study Area, except in the most degraded areas that are of little use to wildlife, and only if access routes go through such degraded areas, needs to be prevented. The state prison, sludge disposal site, and future City of Yuma landfill have been located in prime habitat for the Flat-tailed Horned Lizard. The Area Service Highway, if built, will go right through the area that was supposed to be set aside for the Flat-tailed Horned Lizard. Flat-tailed Horned Lizard habitat that is not already under federal management (which conceivably be used to mitigate some of the effects of Alternative D) is increasingly